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Ms. Mary D. Nichols
Chairperson, California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: VW Settlement and Disadvantaged Communities

Dear Ms. Nichols and Board Members:

Charge Bliss Inc., a California S-corporation that designs, builds, and operates renewable energy Distributed Energy Resources (DER) for disadvantaged communities, would like to express our strong support for the VW/Electrify America plans to contribute to such a system in Carson, California. We are in the final stages of designing a “Zero Net Energy Community” for 19 City properties wherein we will produce as much renewable energy as is consumed by these sites each year, reduce peak load, and increase building efficiencies while adding both level II and fast DC electric vehicle (EV) charging. The Charge Bliss team won a \$1.5M grant from the CEC (GFO-15-312, EPC-15-055, <http://www.energy.ca.gov/contracts/GFO-15-312/>) to design the project and we have arrived at the following parameters:

- 3.2MW parking lot canopy solar
- 5.7MWh battery energy storage
- Smart power conversion and control systems
- Comprehensive lighting replacement with LED bulbs
- Replacement of aging HVAC and chiller systems
- Automated building load management
- 58+ level II EVSE to be allocated as Multi-Unit Dwelling (MUD, 60%) and workplace (40%)
- Fast (50kW) and ultrafast (150kW) DC charging (DCFC) at the Community Center/City Hall as well as along the I405 axis

Notably, the additional usage and load created by the EV charging infrastructure will also be offset by co-located photovoltaic + battery systems. Thus, the project eliminates the effective “carbon footprint” that might otherwise result from such a large deployment of charging devices and mitigates the strain of significant added load. Moreover, Charge Bliss team members Drs. Rajit Gadh and Peter Chu (UCLA) are using a control system architecture to regulate and distribute load through direct interaction with end-users. The project seeks to increase EV

adoption in this disadvantaged community through provision of charging options throughout the City, collaboration with auto dealerships to provide incentives to local residents for EV use, “drive and ride” events, and engagement of STEM students from the two Carson High Schools and California State University at Dominguez Hills. Through key project partners including Adopt-A-Charger and the South Bay Cities Council of Governments (SBCCOG) we are developing options for EV car sharing, ride hailing, and other services to foster broader adoption of zero emissions transportation in this disadvantaged community.

As you are undoubtedly aware, there are multiple reasons to support the City of Carson for this Zero Net Energy Community and for the specific inclusion of Electrify America. ***Indeed, we note that the Electrify America team specifically discusses the Carson project in their most recent submission to CARB as a prime demonstration of the core principles of the consent decree.*** According to US Census data, Carson is one of the most ethnically diverse cities in the United States (Latino: 37%, Asian: 26%, African American: 24%, White: 24%) with a high percentage of low-income families. In addition, the City has some of the poorest air-quality scores in the State of California (98-100, <https://oehha.ca.gov/calenviroscreen/sb535>) and is juxtaposed to many refineries, chemical manufacturing facilities, and other major sources of air pollution. Finally, the City of Carson lies in a critical transportation axis where charging options are essential to foster greater adoption of EV such as the I405, I110, I710, and 91 freeways as well as major East-West surface streets.

Most importantly, the EV charging infrastructure proposal for Electrify America to collaborate in the build of a comprehensive charging network in the Carson community/Charge Bliss project satisfies the following explicit requirements of the consent decree:

1. Create another “Green” City.
2. Provide services to “citizens who live primarily in disadvantaged communities.”
3. Foster adoption of zero emission vehicles in a disadvantaged community.
4. Address comprehensive State air quality goals.

We therefore urge the Air Resources Board to expedite the process for Electrify America to begin their contribution to critical EV infrastructure for disadvantaged communities such as Carson, California. We believe this demonstration of a Zero Net Energy Community juxtaposed with comprehensive zero emission vehicle infrastructure will both meet the consent decree requirements and lead to recognition of the value of comprehensive “green” energy projects for disadvantaged communities.

Thank you for your time and consideration.

David Bliss and the Charge Bliss Team